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Attorneys for Defendant Vigorous Shipping & Trading, S.A.

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

PACIFIC GULF SHIPPING CO.,

Plaintiff,

v.

ADAMASTOS SHIPPING & TRADING  
S.A., VIGOROUS SHIPPING & TRADING,  
S.A., BLUE WALL SHIPPING LTD., and  
PHOENIX SHIPPING & TRADING S.A.,

Defendants.

No. 3:18-cv-02076-MO

UNOPPOSED MOTION FOR ENTRY OF  
STIPULATED PROTECTIVE ORDER

Defendant Vigorous Shipping & Trading S.A. moves the Court for the immediate entry of the Stipulated Protective Order attached hereto as Exhibit 1. The limited and expedited discovery granted by the Court will involve the production of documents believed to contain nonpublic proprietary and confidential information warranting the entry of a protective order. The form of the Stipulated Protective Order is the Court's approved form of Stipulated Protective Order without substantive modification. This motion is unopposed by Plaintiff.

Respectfully submitted this 17<sup>th</sup> Day of December, 2018.

MILLER NASH GRAHAM & DUNN LLP

s/ Sanja Muranovic

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